

EXHIBIT 2

Clark

Q. And Michelle Gotthelf and Dan Greenfield accommodated your schedule by moving your reporting shift to Saturday?

A. Yes.

MS. DATOO: Did you say 2010?

MR. LOVINGER: Yes.

Q. But your classes prohibited you from working certain days; is that correct?

A. Yes.

Q. You could not have been a full-time runner reporter and take those class; is that right?

A. No, I could have -- well what do you mean by full-time reporter; because none of us were full-time reporters, we were doing it as free-lance, and none of the workers there were full-time. I don't understand how they worked it out. We were still considered to be part-time workers, we were not full-time.

Q. Could you have worked five days a week Monday through Friday and taken your classes?

A. No.

Clark

Q. Who do you believe was promoted more quickly than you?

A. I don't know the young lady's name.

Q. It was a women?

A. Yes.

Q. And you don't know her name?

A. No.

Q. Do you know what position she was promoted to?

A. I do know that she was given more reporter shifts.

Q. Are you aware of this woman's prior work experience?

A. No. I believe that she had just graduated from school.

Q. Do you know what kind of degree she had received?

A. No.

Q. When you say that she was given more reporting shifts, is that a promotion?

A. Well for us it is, that is why it is so hard to explain. As copy news assistants for us that is given more reporter

Clark

Q. Did you ever apply for a full-time position?

A. At another company?

Q. No, at the New York Post. Did you ever apply for a full-time position at the New York Post?

A. Not that I remember, I don't remember.

Q. Did you apply for other positions at the New York Post?

A. I don't remember.

Q. Did you apply for positions in departments other than the city desk at the New York Post?

A. I don't remember.

Q. Did you ever request to perform work for other departments of the New York Post in connection with your role as a copy assistant?

A. I don't remember.

Q. Do you believe that other copy assistants were promoted more quickly than you?

A. Yes.

Clark

shifts that is a promotion for us only because you are working the copy shift to get the reporting shifts, and the more you get the better it is for you.

Q. Were you aware of this woman's qualifications?

A. No.

Q. Were you aware of this woman's prior writing experience?

A. I believe she said that she interned somewhere, but I don't know exactly where.

Q. Were you aware of this woman's prior reporting experience?

A. I don't believe she reported anywhere, but I know she interned. I don't remember exactly where she interned though.

Q. Did you have any knowledge of this woman's quality of work?

A. No.

Q. Did you ever personally review this woman's work product?

A. From the stories that were printed in The Post, yes. If I am reading the paper I

1 Clark
2 would read it and see the byline and stuff
3 like that.
4 Q. Did you ever hear any of the
5 editors at the paper talk about why this woman
6 received the assignments she did?
7 A. No.
8 Q. As part of your duties as a copy
9 assistant were you expected to answer
10 telephones?
11 A. No, but if you had to you did.
12 But --
13 Q. What do you mean if you had to?
14 A. Because that was someone else's
15 role. Myron and Ionte and someone else would
16 handle that side of it. But if you noticed
17 that they may have stepped away and you hear
18 the phone keep ringing you would answer it,
19 you know, just to try to help them out out of
20 consideration and stuff.
21 Q. So whose phones would you answer?
22 A. Well it was not specifically their
23 phone, they all three of them shared the
24 phone, whoever was sitting in that area.
25 Q. Okay. The phone calls, the

1 Clark
2 E-mail, and then someone would get back to
3 them about it.
4 Q. Are you aware if The Post has ever
5 missed a story that another paper got because
6 of a missed phone call?
7 A. No.
8 Q. When did you first become aware
9 that you had to answer telephones as part of
10 your job?
11 MR. DATOO: Objection.
12 A. One day someone had stepped away
13 to go to the bathroom and the phone kept
14 ringing and it was ringing and ringing, and I
15 don't remember who screamed, but one of the
16 editors screamed really loud for us to answer
17 the phone, and then that is when we realized
18 that we had -- that is the day that I realized
19 that we had to answer the phone because before
20 that I didn't know, and it just kept ringing
21 and ringing and ringing, but we didn't realize
22 it, and then one of the editors yelled for us
23 to answer it.
24 Q. Who was it who screamed really
25 loud for you to answer the phone?

1 Clark
2 incoming phone calls would include people from
3 outside The Post calling; right?
4 A. Yes.
5 Q. Did people call the newspaper with
6 story ideas?
7 A. Sometimes.
8 Q. Did people call the newspaper with
9 tips for stories?
10 A. Yes.
11 Q. Did you ever receive a call from
12 someone with a tip about a story?
13 A. Not that I remember.
14 Q. Did you ever receive a phone call
15 from someone with a story idea?
16 A. Yes. I don't remember exactly
17 what the idea was, but I, you know, I can
18 recall a few people when you answer they say
19 that they have a story idea or they give you a
20 suggestion.
21 Q. And then who did you pass it along
22 to?
23 A. Sometimes they would tell you to
24 give them the general E-mail so they can
25 submit their story idea or their tip to that

1 Clark
2 A. I don't remember which editor it
3 was, but I know someone screamed loud to
4 answer the phone.
5 Q. Were you offended when that person
6 screamed for you to answer the phone?
7 A. In a way yes because being that
8 the news room is so open and then the way they
9 screamed and how loud they screamed, it just
10 makes you feel uncomfortable.
11 Q. Do you remember what words were
12 used?
13 A. I don't remember.
14 Q. Did they specifically use your
15 name?
16 A. I don't think that they used my
17 name specifically, I think they were referring
18 to all of the news room assistants at the time
19 that were there present at that time.
20 Q. And that offended you?
21 A. Uh-hum.
22 Q. Do you know how long you had been
23 working at The Post when that happened?
24 A. I don't remember.
25 Q. Did you think that there was